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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF UTAH, CENTRAL DIVISION**

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ZOOBUH, INC., a Utah Corporation  Plaintiff,  vs.  JDI DATING, LTD; WILLIAM MARK THOMAS,  Defendants.	<b>MOTION AND MEMORANDUM FOR ENTRY OF DEFAULT JUDGMENT</b>  Case No.: 2:17cv00163 DB  Judge Dee Benson
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Pursuant to Fed. R. Civ. P. 55(b)(1), Plaintiff respectfully moves the Clerk of the Court to entry of a Judgment by Default herein.

As grounds, and as more particularly set forth in the Affidavit of Jordan K. Cameron, the Summons and Complaint have been duly filed and served, the time for the response to such has expired, Defendant JDI Dating, Ltd has failed and/or refused to respond thereto or otherwise defend, and the relief requested in the Complaint is reasonable and appropriate under the circumstances.

The Complaint specifies a specific sum of damages in the Request for Relief, specifically, a total aggregate damage amount in not less than \$3,784,850.

As the Complaint specifies the sum of damages, the Clerk of Court can enter default and judgment pursuant to Fed. R. Civ. P. 55(b)(1) which states, “If the plaintiff’s claim is for a sum certain or a sum that can be made certain by computation, the clerk—on the plaintiff’s request, with an affidavit showing the amount due—must enter judgment for that amount and costs against a defendant who has been defaulted for not appearing and who is neither a minor nor an incompetent person.”

A proposed form Judgment by Default and Motion of Entry of Default are lodged herewith.

DATED this 17th day of July, 2017.

DURHAM, JONES & PINEGAR, P.C.

/s/ Jordan K. Cameron  
Jordan K. Cameron  
*Attorneys for Plaintiff*